

## REMARKS/ARGUMENTS

Claims 1-38 are pending in the application. Claims 1-6, 18-23 and 35-38 are rejected as anticipated under 35 U.S.C. 102(b), and claims 7-17 and 24-34 are rejected as obvious under 35 U.S.C. 103(a).

### *Claim Amendments*

The amendment of independent method claim 1 and independent system claim 18 proposes a method and system, respectively, for providing worldwide web content, centralized management, and local and remote administration for a self-service transaction terminal that involves receiving a request for and starting up one or more of a system monitor, session manager, device manager, system manager, diagnostics application, intelligent maintenance panel, log manager, installation framework, and configuration framework transaction terminal process by a process controller of the transaction terminal, and additionally receiving a request for and starting up screen reader and audio processes by the process controller. The amendment of claims 1 and 18 propose further that one or more pre-defined transaction terminal functions are performed by the started processes, and that in addition, screen reader and audio application functions are performed by the screen reader and audio processes consisting at least partly of converting text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user. See, e.g., p. 3, line 28-p. 4, line 3.

The amendment of independent method claim 35 proposes a method for providing worldwide web content, centralized management, and local and remote administration for a self-service transaction terminal that involves receiving a request for a startup of one or more transaction terminal processes by the process controller of the transaction terminal from an integrated network control or an operator interface, and additionally receiving a request for and starting up screen reader and audio processes by

the process controller. The amendment of claim 35 proposes further that one or more pre-defined transaction terminal functions are performed by the started processes, and additionally that the screen reader and audio processes perform screen reader and audio application functions consisting at least partly of converting text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user. See, e.g., p. 3, line 28-p. 4, line 3.

Claims 9 and 26 are canceled as a result of the amendment of claims 1 and 21; claims 30-38 are amended to correct misnumbering; and claims 6-8, 10-18, 23-25, and 27-38 are amended to address editorial issues raised by the amendment of claims 1, 21, and 35. Support for the foregoing amendment is found throughout the specification and in the claims and as detailed above. Accordingly, no new matter has been added.

### ***Claim Rejections - 35 U.S.C. § 102***

Claims 1-6, 18-23, and 35-38 stand rejected as anticipated by Zeanah et al. (U.S. 5,933,816) under 35 U.S.C. § 102(b). The rejection is respectfully traversed and reconsideration is requested. The reference asserted does not read on the claimed invention.

With regard to independent claims 1, 18, and 35, the Examiner considers that Zeanah et al, which teach a method and system for delivering financial services to customers at remote terminals via a network, such as an ATM network, disclose each and every element of claims 1, 18, and 35. On the contrary, Zeanah et al. do not teach or suggest receiving a request for and starting up one or more of a system monitor, session manager, device manager, system manager, diagnostics application, intelligent maintenance panel, log manager, installation framework, and configuration framework transaction terminal process by a process controller of the transaction terminal, as recited in claims 1 and 18.

It is true that Zeanah et al. disclose an ATM touchscreen for customer interface and a process controller component that starts up non-session system service and peripheral device management processes in the ATM network. See, e.g., Zeanah et al. Col 6, lines 39-40; Col 9, lines 37-39. However, instead of a system manager and a system monitor, as recited in claims 1 and 18, Zeanah et al. disclose an instrument manager component that supports a counter instrument, a bounded counter instrument, a status instrument, and a control instrument and system management agents that include a management protocol agent, a command dispatch agent, and a status management agent. See, e.g., Zeanah et al., Col 10, lines 20-34; Col 10, lines 50-52.

Further, instead of a diagnostics application, as recited in claims 1 and 18, Zeanah et al. disclose only that a peripheral device manager component coordinates usage of peripheral devices between customers and diagnostic activities, and merely indicates that a diagnostic interface is 'supported'. See, e.g., Zeanah et al., Col 8, line 51-Col 9, line 6. In addition, instead of an intelligent maintenance panel, as recited in claims 1 and 18, Zeanah et al. teach, e.g., device manager and peripheral device handler components. See, e.g., Zeanah et al., Col 8, lines 39-58. Additionally, instead of installation and configuration frameworks, Zeanah et al. simply disclose, e.g., that the peripheral device manager component manages components that interface with peripheral devices. See, e.g., Zeanah et al., Col 8, lines 39-58.

Significantly, contrary to the Examiner's conclusion, Zeanah et al. neither teach nor suggest a screen reader application, as recited in claims 1, 18, and 35. It is true that Zeanah et al. disclose a touch screen, screen display, card reader, speech generator, sound generator, audio generator, and video player. See, e.g., Zeanah et al., Col 9, lines 12-17. However, there is absolutely no disclosure or suggestion whatsoever in Zeanah et al. of screen reader and audio processes and application functions, consisting at least in part of converting text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user, as recited in claims 1, 18, and 35. Consequently, Zeanah et al. do not teach the required combinations of Applicants'

claimed method and system for method for providing worldwide web content, centralized management, and local and remote administration for a self-service transaction terminal.

Because each and every element as set forth in independent claims 1, 18, and/or 35 is not found, either expressly or inherently in the cited reference, the Examiner has failed to establish the required *prima facie* case of unpatentability. See Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628 (Fed. Cir. 1987); See also MPEP §2131. The Examiner has failed to establish the required *prima facie* case of unpatentability for independent claims 1, 18, and/or 35, and similarly has failed to establish a *prima facie* case of unpatentability for claims 2-6 that depend on claim 1, claims 19-23 that depend on claim 18, and claims 36-38 that depend on claim 35, and which recite further specific elements that have no reasonable correspondence with the references.

### ***Claim Rejections - 35 U.S.C. § 103***

Claims 7, 8, 10-17, 24, 25, and 27-34 stand rejected under 35 U.S.C. § 103(a) as obvious over Zeanah et al., and claims 9 and 26 stand rejected under 35 U.S.C. § 103(a) as obvious over Zeanah et al. in view of Blumstein et al. (U.S. 5,589,855).

Blumstein et al. do not remedy the deficiencies of Zeanah et al. Again, contrary to the Examiner's conclusion, there is no teaching or suggestion whatsoever in Blumstein et al. of a screen reader application, as recited in claims 1, 18, and 35. On the contrary, Blumstein et al. is the precise example of the type of ATM on which a visually impaired user is allowed to enter numbers by touching the touchscreen a certain number of times and which provides audio feedback to the user via a scripted audio functionality via a built-in loudspeaker to supplement the touchscreen/keypad interface described in the "Background" section of the present application. See, e.g., p. 3, lines 28-34. However, as also pointed out in the "Background" section of the application, such ATMs do not provide a satisfactory solution for visually impaired users, because the

scripted prompts are audible to passers-by, which compromises both the privacy and the security of the visually impaired person's ATM transaction. See, e.g., p. 4, lines 1-3.

Therefore, Zeanah et al. and/or Blumstein et al., either separately or in combination with one another, do not disclose nor even suggest the required combination of limitations of independent claims 1, 18, and/or 35 of Applicant's claimed method and system for method for providing worldwide web content, centralized management, and local and remote administration for a self-service transaction terminal utilizing screen reader and audio processes and application functions, consisting at least partly of converting text to audible speech and diverting the audible speech to a headphone for a visually impaired user, while eliminating audio via external speaker at the transaction terminal, and providing a screen layout with navigation selections exclusively by touchscreen for the visually impaired user.

The claimed combinations are not taught or suggested by the references either separately or in combination with one another. Because the cited references, either alone or in combination, do not teach the limitations of independent claims 1, 18, and/or 35, the Examiner has failed to establish the required *prima facie* case of unpatentability. See In re Royka, 490 F.2d 981, 985 (C.C.P.A., 1974) (holding that a *prima facie* case of obviousness requires the references to teach all of the limitations of the rejected claim); See also MPEP §2143.03. The Examiner has failed to establish the required *prima facie* case of unpatentability for independent claims 1, 18, and/or 35, and similarly has failed to establish a *prima facie* case of unpatentability for claims 8 and 10-17 that depend on claim 1 and claims 24, 25, and 27-34 that depend on claim 18, and which recite further specific elements that have no reasonable correspondence with the references.

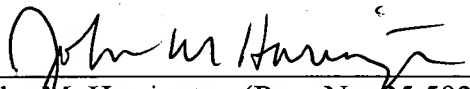
### Conclusion

In view of the foregoing amendment and these remarks, each of the claims remaining in the application is in condition for immediate allowance. Accordingly, the examiner is requested to reconsider and withdraw the rejection and to pass the

application to issue. The examiner is respectfully invited to telephone the undersigned at (336) 607-7318 to discuss any questions relating to the application.

Respectfully submitted,

Date: 6/4/04

  
John M. Harrington (Reg. No. 25,592)  
for George T. Marcou (Reg. No. 33,014)

Kilpatrick Stockton LLP  
607 14th Street, NW, Suite 900  
Washington, DC 20005  
(202) 508-5800